

2. The FBI Issued a Report Concluding That Inadequate Management Controls Contributed to the Release of Background Reports of Former White House Staff to the White House Office of Personnel Security.

On June 14, 1996, the FBI issued its "Report of the FBI General Counsel on the Dissemination of FBI File Information to the White House" (hereinafter, the "Shapiro Report"). The Shapiro Report found that the FBI had responded routinely to unsigned pre-printed form memoranda requesting copies of FBI background investigation reports -- a process that had been followed at least since the Johnson Administration.³² In addition, the Shapiro Report noted that while the research analysts processing the requests had noticed an increase in the volume of requests in late 1993, no one had questioned the propriety of the requests.³³ The Shapiro Report concluded that FBI management had failed to supervise properly the dissemination of information from FBI background reports.³⁴ The Shapiro Report also concluded that although the FBI acted in compliance with the Privacy Act, it failed to assess and balance adequately the competing interests underlying the Privacy Act.³⁵ Since then,

³² Id. at 1.

³³ Id. at 27, 28.

³⁴ Id. at 29.

³⁵ Id. at 13-14.